

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection July 1, 1997 Time start 10:15 am Time finish 12:15 pm
Name of Inspector P. Handke
Company, installation name Stanley Flagg & Co., Inc.
Location 1020 West High Street, Stowe, PA 19464
County Montgomery Municipality West Pottsgrove Twp.
Identification number PAD001737899
Name of responsible official Gary Lyman
Title Corporate Environmental Engineer
Mailing Address 1020 West High Street, Stowe, PA 19464
Area code and telephone number 610/326-6000
Name of person interviewed Jerry Stick
Title Consultant
Mailing address (if different from above) Same
Area code and telephone number Same

1. Current waste handling method:

- | | | | | |
|---|-------------------------------------|-----------------------------------|--|---|
| a. <input type="checkbox"/> On-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | <input type="checkbox"/> PBR |
| b. <input type="checkbox"/> On-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |
| c. <input type="checkbox"/> Off-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | |
| d. <input checked="" type="checkbox"/> Off-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input checked="" type="checkbox"/> recycle, | <input checked="" type="checkbox"/> reclaim |

2. Amount of hazardous waste produced:

- a. See report kg./mo.
b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
D039	Safety-Kleen Corp.	Reclaim
	West Chester, PA 19380	
	PAD000738849	
D006, D008	Philips Environmental Services	Recycle
	Hamilton, Ont. L8L-7W2	
	A160145	

4. Source Reduction: ☐ accomplished, ☒ proposed, ☐ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART B

Site Name Stanley Flogg & Co. ID Number PAD001737899 Date July 1, 1997

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Hazardous waste determination, performed on all waste streams	262.11	H001
X				Identification number	262.12	H002
X				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
X				Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
X				PA manifest used for intrastate shipments	262.20(b)	H005
X				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
X				Manifests filled out properly and completely	262.20(g)	H007
X				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
X				Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
X				Shipping containers marked and labeled according according to U.S. DOT	262.30(2)	H010
X				Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
X				Placards offered to transporter	262.33	H012
X				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
X				Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
X				Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
X				a). All containers of haz. waste in good condition	265.171	H016
X				b). Containers compatible with hazardous waste being stored within	265.172	H017
X				c). Containers of hazardous waste kept closed	265.173(a)	H018
X				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
X				e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
X				f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
X				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177	H022
X				h). Proper containment and collection system(s)	265.178	H023
X				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
X				On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H025

**Hazardous Waste Inspection Report
Generators - Part B**

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Records retained at designated location for 20 years	262.40(a)	H026
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Quarterly reports submitted to the Department	262.41(a)	H027
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Exception reporting procedures followed	262.42	H028
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Hazardous waste disposal plan, if required	262.45	H029
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Spill reporting procedures followed	262.46(a)	H030
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements followed for international shipments	262.50, .53, .55, .60	H032
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Source reduction strategy prepared and available	262.80	H033

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection July 1, 1997 Identification Number PAD001737899
Company/Facility/Site Name Flagg Brass, Division of Amcast Industrial

A hazardous waste generator inspection was conducted on Tuesday, July 1, 1997 by Paul Handke and Christian Kuba, Solid Waste Specialists. Jerry Stick, Consultant, granted access to the site and was the person interviewed during the inspection.

The following observations were made:

- 1) This facility generates two hazardous waste streams; sand and metal grindings and parts cleaner.
- 2) The waste sand and metal grindings (D006, D008) are generated in the 36 foundry 36 cleaning from the cleaning of brass castings. This waste is hazardous for lead and cadmium. The waste is collected at the generation point in hoppers. Each hopper is labeled with a hazardous waste label. The hoppers are staged at the mill dust storage area and are then taken to a roll-off in a storage area. The roll-off is lined and is labeled as containing hazardous waste. An inspection log is kept for the area, indicating when new roll-offs are placed in this area. This waste is transported by John Pfrommer, Inc., license number PA-AH0042, to Phillips Environmental Services Corporation (A100145) in Hamilton, Ontario, Canada for recycling. The notices of intent to export were submitted to both the Department and the Environmental Protection Agency for the calendar year 1997 and the port of departure is noted on each shipment manifest. Flagg Brass generates approximately 4 roll-offs of this waste weighing approximately 38,000 pounds each.
- 3) Waste parts cleaner is also generated. The parts cleaner is transported by Safety Kleen Corporation, license number PA-AH0172, to Safety Kleen Corporation (PAD000738849) in West Chester, Pennsylvania for reclamation. Flagg Brass generates approximately 100 gallons of waste cleaner per quarter, or every 3 months.
- 4) The PPC Plan and the source reduction strategy are currently being updated for this facility.
- 5) Employee training consists of Hazardous Waste Management Training. One employee attended this training within the last year and trained the fork lift operator who transports the hazardous waste from the mill dust storage area to the hazardous waste roll-off. It was suggested that records be maintained of the internal trainings and to possibly train other employees who might have to become involved with the handling of the hazardous waste if the regular fork lift operator is not available. All employees have hazardous material communication training when hired and attend a yearly refresher. The foundry employees also attend lead training.

No violations were noted on this date. These items were discussed with Mr. Stick and Gary Lyman, Corporate Environmental Engineer, during and after the inspection. A copy of this report was mailed to the facility on the date indicated below.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Copy mailed to Facility Date 7/9/97
Inspector (signature) [Signature] Date 7/9/97

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT HAZARDOUS WASTE PERMIT BY RULE FACILITY

Company, Installation Name Stanley Flagg + Co., Inc
Identification Number PAD001737899

Determination of Applicability Required? (Subchapter I) Yes ☒ No ☐ N.D. ☐

Documentation Available? Yes ☒ No ☐ N.D. ☐

Does facility accept wastes from off-site for treatment in the PBR system? Yes ☐ No ☒ N.D. ☐

Does facility have an NPDES permit? Yes ☒ No ☐ N.D. ☐

If yes, NPDES Permit Number PA 0050903

If no, does facility discharge to a sewage treatment system with an NPDES permit? If yes, NPDES Permit Number Yes ☐ No ☒ N.D. ☐

If yes, does system meet all Federal, State and local pretreatment standards? Yes ☒ No ☐ N.D. ☐

If system does not directly discharge to a POTW or its own NPDES permitted discharge, explain here.

* This facility no longer treats hazardous waste and has renitized as such (see attached).

Site Name Stanley Flagg + Co., Inc ID Number PAD001737899 Date July 1, 1997

Hazardous Waste Inspection Report Hazardous Waste Permit by Rule Facility (WWTP)

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION
1	2	3	4		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Facility has applied for or received an EPA Hazardous Waste identification Number	264.11(a)
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Active portion has 24 hour surveillance	264.14(b)(1)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Artificial barrier surrounds active portion	264.14(b)(2)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper signs are posted	264.14(c)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Inspection schedule is retained at facility	264.15(b)(1)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Inspections are conducted as per inspection plan	264.15(c)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Deterioration and/or malfunctions of equipment corrected as revealed by inspections	264.15(d)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Immediate remedial action taken when a hazard is imminent or already present	264.15(d)

Hazardous Waste Inspection Report
Hazardous Waste Permit by Rule Facility (WWTP)

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION
1	2	3	4		
	X			Inspection log is maintained and utilized properly	264.15(e)
				Personnel training plan approved by DER and implemented	264.16(a)
				Personnel documents and records maintained at the facility	264.16(f)
				Facility is equipped with internal alarm system capable of providing immediate emergency instruction to personnel	264.32(1)
				Facility is capable of summoning outside emergency assistance	264.32(2)
				Facility is equipped with spill and decontamination control equipment is periodically tested and maintained	264.32(3)
				Facility communications and/or alarm systems, and spill and decontamination control equipment is periodically tested and maintained	264.33
				Adequate aisle space is maintained to allow unrestricted access for personnel and emergency equipment	264.35
				Current PPC plan, prepared and implemented in accordance with Department's guidelines. Copy available at site.	264.52(b)
				Designated primary emergency coordinator and is on-site or on call at all times	264.55
				Operating records are maintained at the facility.	264.73(a)
				Operating record contains description and quantities of wastes treated and discharged under PBR performed under 264.13, 264.17 and Subchapter O	264.73(b)(1)
				Operating record contains results of waste analyses and trial tests	264.73(b)(3)
				Operating record contains summary reports and details of any incidents requiring implementation of PPC plan	264.73(b)(4)
				Operating record contains results of all on-site inspections, including those outlined in 264.15	264.73(b)(5)
				Emissions, discharges, fires, explosions and groundwater contamination reported as required	264.77(1)
				Quarterly report of waste treated under PBR submitted to the Department	264.77(b)
				Special precautions are taken for ignitable, reactive or incompatible wastes	265.17(b) 265.401(a)
				Treatment process or equipment compatible with waste and treatment agents	265.401(b)
				Waste analyses and trial treatment tests conducted when required	265.402(1)
				Continuously fed equipment is fitted with a means of stopping inflow	265.401(c)
				Daily inspection of discharge control and safety equipment	265.403(1)
				Weekly inspection of process equipment and discharge confinement structures	265.403(3),(4)

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection July 1, 1997 Identification Number PAD001737899
Company/Facility/Site Name Flagg Brass, Division of Amcast Industrial

A hazardous waste permit by rule wastewater treatment unit inspection was conducted on Tuesday, July 1, 1997 by Paul Handke and Christian Kuba, Solid Waste Specialists. Jerry Stick, Consultant, granted access to the site and was the person interviewed during the inspection.

The following observations were made:

1) This facility no longer accepts hazardous waste for treatment. A letter to the Department was submitted by Flagg Brass, on January 2, 1997, notifying that this facility no longer accepts hazardous waste for treatment. (see attached)

2) On this date surface water from the galvanizing lagoons was being pumped and treated, in preparation for the closure of the lagoons. Surface water which was formally treated at this facility is now being directly discharged under a storm water discharge permit.

No violations were noted on this date. These items were discussed with Mr. Stick and Gary Lyman, Corporate Environmental Engineer, during and after the inspection. A copy of this report was mailed to the facility on the date indicated below.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Copy mailed to Facility Date 7/9/97
Inspector (signature) [Signature] Date 7/8/97



JAN 08 1997

Pennsylvania Department of Environmental Protection
Bureau of Waste Management
P.O. Box 2063
Harrisburg, PA 17120

January 2, 1997

Certified Mail Z 123 985 885

Dear Sirs,

Enclosed is a revised EPA Form 8700-12 for this facility. Please note the name change from Stanley G. Flagg to Flagg Brass. You will also note that this facility no longer request PBR status.

I believe the remainder of the form is self explanatory but should I be of further assistance, please feel free to contact me at this location.

Respectfully,

Gary J. Lyman
Corporate Environmental Engineer

cc: John Kasarda, PADEP Southeast Region

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENTHAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 18 SEPT 96 Time start 1030 hrs Time finish 1230 hrs
 Name of Inspector JOHN KASARNA
 Company, installation name FLAGG BRASS
 Location 1020 W. HIGH STREET STONE PA 19364
 County MONTGOMERY Municipality W. POTTSBORO TWP
 Identification number PAD001737899
 Name of responsible official GARY LYMAN
 Title CORPORATE ENVIRONMENTAL ENGINEER
 Mailing Address SAME AS ABOVE
 Area code and telephone number 610-326-9000 (X1387)
 Name of person interviewed JERRY STICK
 Title _____
 Mailing address (if different from above) SAME
 Area code and telephone number SAME

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
 b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
 c. ☒ Off-site ☒ treatment, ☐ storage, ☐ disposal
 d. ☒ Off-site ☐ use, ☐ reuse, ☒ recycle, ☒ reclaim

2. Amount of hazardous waste produced:

- a. 80 ^{tons} /mo.
 b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
D006	Phillip Environmental	ONTARIO CANADA; Reclam.
D008	Phillip Environmental	"
D006, D008	Republic Environmental Systems	HARTFELD PA; TREATMENT
D039	SAFETY KLEEN	W. CHESTER PA; RECYCLE

4. Source Reduction: ☐ accomplished, ☒ proposed, ☐ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name FLAGG BRASS ID Number PAD001737899 Date 18 SEPT 96

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Hazardous waste determination, performed on all waste streams	262.11	H001
X				Identification number	262.12	H002
X				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
X				Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
X				PA manifest used for intrastate shipments	262.20(b)	H005
X				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
X				Manifests filled out properly and completely	262.20(g)	H007
X				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
X				Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
X				Shipping containers marked and labeled according according to U.S. DOT	262.30(2)	H010
X				Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
X				Placards offered to transporter	262.33	H012
X				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
X				Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
X				Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
X				a). All containers of haz. waste in good condition	265.171	H016
X				b). Containers compatible with hazardous waste being stored within	265.172	H017
X				c). Containers of hazardous waste kept closed	265.173(a)	H018
X				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
X				e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
X				f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
X				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - 177	H022
X				h). Proper containment and collection system(s)	265.178	H023
X				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
		X		On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H025

**Hazardous Waste Inspection Report
Generators - Part B**

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Records retained at designated location for 20 years	262.40(a)	H026
	X			Quarterly reports submitted to the Department	262.41(a)	H027
X				Exception reporting procedures followed	262.42	H028
X				Hazardous waste disposal plan, if required	262.45	H029
X				Spill reporting procedures followed	262.46(a)	H030
		X		Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031
X				Special requirements followed for international shipments	262.50, .53, .55, .60	H032
X				Source reduction strategy prepared and available	262.80	H033

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 27 September 1996Identification Number PAD001737899Company/Facility/Site Name Flagg Brass

A hazardous waste large quantity generator inspection of Flagg Brass was conducted on 27 September 1996 by John Kasarda, Waste Management Specialist, with the Department of Environmental Protection. Jerry Stick and Conrad Heinbach were present for Flagg Brass.

The following observations were made:

1. Mr. Stick went through the system where the hazardous waste is taken from the manufacturing area and placed into the hazardous waste roll-off container.
2. The accumulation area is inspected by Mr. Stick on a daily basis. Clean-up and maintenance is conducted by Mr. Stick at least once a week. The gangway leading to the roll-off is vacuumed daily and emptied into the roll-off.
3. The hazardous waste baghouses are emptied as needed. A log is kept of the date it was emptied and the total weight. The baghouse dust is taken to Republic Environmental Systems.
4. Safety-Kleen Corporation, located in West Chester, receives the waste combustible liquids (petroleum naphtha).
5. The hazardous waste roll-off is transported off-site by John Pfrommer, Inc. (PAD008781072) (PA-AH 0042) and taken to Phillip Environmental Services Corporation in Hamilton, Ontario (A100145).
6. The manifests were reviewed and found to be in proper order.

The results of the inspection were discussed with Mr. Stick and Mr. Heinbach before leaving the facility. No violations observed.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Copy mailed to facility

Date

8 Oct 96

Inspector (signature)

Date

8 Oct 96Page 4 of 4

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 11/16/95 Time start _____ Time finish _____
Name of Inspector BILL MILLER
Company, installation name FLAGG BRASS
Location 1020 W. HIGH ST. STOWE, PA 19464 (610)326-9000
County Montgomery Municipality W. Pottsgrove Twp
Identification number PAD 001737899
Name of responsible official GARY LYMAN
Title CORP. ENVIRONMENTAL ENGINEER
Mailing Address SAME
Area code and telephone number AS ABOVE
Name of person interviewed JERRY SEICK
Title ENVIRONMENTAL TECHNICIAN
Mailing address (if different from above) SAME
Area code and telephone number AS ABOVE

1. Current waste handling method:

- | | | | | |
|---|--|--|--|---|
| a. <input type="checkbox"/> On-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | <input type="checkbox"/> PBR |
| b. <input type="checkbox"/> On-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |
| c. <input checked="" type="checkbox"/> Off-site | <input checked="" type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input checked="" type="checkbox"/> disposal | |
| d. <input checked="" type="checkbox"/> Off-site | <input checked="" type="checkbox"/> use, | <input checked="" type="checkbox"/> reuse, | <input checked="" type="checkbox"/> recycle, | <input checked="" type="checkbox"/> reclaim |

2. Amount of hazardous waste produced:

- a. > 1000 kg./mo.
b. > 12,000 kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
D006 D008	Phillip Env. Services	Hamilton Ontario
D001 D008	Republic Env. Systems	Hatfield, PA

4. Source Reduction: ☐ accomplished, ☒ proposed, ☐ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name FLAGG BRASS ID Number PAD 001737899 Date 11/16/95

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Hazardous waste determination, performed on all waste streams	262.11	H001
X				Identification number	262.12	H002
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X				Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
X				PA manifest used for intrastate shipments	262.20(b)	H005
X				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
X				Manifests filled out properly and completely	262.20(g)	H007
X				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
X				Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
X				Shipping containers marked and labeled according according to U.S. DOT	262.30(2)	H010
X				Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
X				Placards offered to transporter	262.33	H012
X				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
			X	Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
X				Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
X				a). All containers of haz. waste in good condition	265.171	H016
X				b). Containers compatible with hazardous waste being stored within	265.172	H017
X				c). Containers of hazardous waste kept closed	265.173(a)	H018
X				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
X				e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
X				f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
X				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177	H022
X				h). Proper containment and collection system(s)	265.178	H023
X				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
X				On the job or classroom personnel training program as per 265 16	262.34(a)(5)	H025

**Hazardous Waste Inspection Report
Generators - Part B**

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Records retained at designated location for 20 years	262.40(a)	H026
X				Quarterly reports submitted to the Department	262.41(a)	H027
X				Exception reporting procedures followed	262.42	H028
X				Hazardous waste disposal plan, if required	262.45	H029
X				Spill reporting procedures followed	262.46(a)	H030
X				Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031
X				Special requirements followed for international shipments	262.50, .53, .55, .60	H032
X				Source reduction strategy prepared and available	262.80	H033

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
TSD FACILITIES - PART A

Date of Inspection 11/16/95 Time start _____ Time finish _____
Name of Inspector BILL MILLER
Company, installation name FLAGG BRASS
Location 1020 W. HIGH ST. STOWE, PA 19464 (610) 326-9000
County Montgomery Municipality West Pottsgrove Twp
Identification number PAD 001737899
Name of responsible official GARY LYMAN
Title CORP. ENVIRONMENTAL ENG.
Mailing Address SAME
Area code and telephone number AS ABOVE
Name of person interviewed Jerry Stick
Title ENVIRONMENTAL TECHNICIAN
Mailing address (if different from above) SAME AS ABOVE
Area code and telephone number SAME AS ABOVE

1. Site characterization:

- a. ☐ Treatment - ☐ surface impoundments ☐ chemical ☐ physical ☐ biological
b. ☒ Storage - ☐ containers ☒ tanks ☐ surface impoundments ☒ waste piles
c. ☐ Disposal - ☐ land treatment ☐ landfill ☐ incineration ☐ thermal treatment
d. ☐ Use ☐ reuse ☐ recycle ☐ reclaim

2. Does the facility generate hazardous waste? ☒ Yes ☐ No

3. Types of hazardous waste produced by Hazardous Waste Number:

D001 D008 D006

4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☒ No

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
TSD FACILITIES - PART B**

Site Name FLAGG BRASS ID Number PAD 001737899 Date 11/16/95

Hazardous Waste Inspection Report
TSD Facilities - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE NUMBERS
1	2	3	4			
			X	Part A permit application submitted	265.1(b) 265.431(a)	H200
X				Identification number	265.11	H201
X				Wastes accepted at facility transported by haulers licensed by DER to transport hazardous waste	265.11(a)	H202
	X			Waste streams not covered by permit approved by DER before acceptance	265.13(a)	H203
X				Chemical and physical analysis repeated as required	265.13(a)(1-3)	H204
X				All waste shipments inspected and analyzed when necessary	265.13(b)	H205
	X			Waste analysis plan on-site	265.13(c)	H206
X				24 hr. surveillance at active portion	265.14(b)(1)	H207
X				Artificial barrier around active portion	265.14(b)(2)	H208
		X		Proper signs posted at each entrance, minimum 4 inch lettering	265.14(c)	H209
X				Facility inspection schedule on-site	265.15(b)(1)	H210
X				Maintenance schedule onsite for equipment or structures which reveal deterioration or malfunction	265.15(d)	H211
X				Immediate remedial action taken where a hazard is imminent or has already occurred	265.15(d)	H212
X				Approved on the job or classroom personnel training program implemented	265.16	H213
X				Records retained for each employee at facility of training, job title, and job description	265.16(f);(g)	H214
	X			Ignitable or reactive wastes separated from source of ignition or reaction	265.17(a)	H215
X				No smoking signs displayed where there are hazards from ignitable or reactive wastes	265.17(a)	H216
X				Treatment, storage, disposal of ignitable or reactive wastes or mixing of incompatible wastes or materials conducted according to requirements	265.17(b)	H217
X				Facility maintained/operated to minimize possibility of fire, explosion, or discharge of hazardous waste or hazardous constituents	265.31	H218

Hazardous Waste Inspection Report

TSD Facilities - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE NUMBERS
1	2	3	4			
X				Facility equipped with internal alarm capable of providing immediate emergency instruction to personnel	265.32(1)	H219
X				Device for summoning outside emergency assistance available at scene of operations	265.32(2)	H220
X				Facility equipped with fire control, spill control, and decontamination equipment	265.32(3)	H221
X				Facility equipped with water at adequate volume and pressure to supply fire control equipment	265.32(4)	H222
X				Facility communications or alarm systems, fire control, spill control, and decontamination equipment tested and maintained	265.33	H223
X				Adequate aisle space maintained to allow unobstructed movement of personnel and equipment during emergencies	265.35	H224
X				Contingency plan onsite and implemented	265.51(a)	H225
X				Contingency plan describes action taken by personnel in the event of an emergency	265.52(a)	H226
X				Contingency plan describes arrangements agreed to for outside emergency services such as police and fire department, hospitals, contractors, etc.	265.52(c)	H227
X				Contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator	265.52(d)	H228
X				Contingency plan contains list of emergency equipment including location, physical description and capabilities of each item	265.52(e)	H229
X				Contingency plan contains an evacuation plan if there is a possibility that evacuation could be necessary	265.52(f)	H230
X				Emergency coordinator designated and on the premises or on call	265.55	H231
	X			Facility accepting only PA manifests	265.71(a)	H232
	X			Manifest properly completed and routed within time limits	265.71(b)(c)	H233
	X			Manifest discrepancies resolved or reported within time limits	265.72(b)	H234
	X			Written operating record maintained on the premises	265.73(a).	H235
	X			Written operating record contains description and quantity of wastes and method of treatment, storage or disposal	265.73(b)(1)	H236
	X			Written operating record contains location and quantity of each hazardous waste	265.73(b)(2)	H237
	X			Written operating record contains results of waste analyses and treatability tests	265.73(b)(3)	H238
	X			Written operating record contains reports and details of all incidents	265.73(b)(4)	H239
	X			Written operating record contains records and results of all inspections	265.73(b)(5)	H240
	X			Written operating record contains required monitoring, testing, and analytical data	265.73(b)(6)	H241

**Hazardous Waste Inspection Report
TSD Facilities - Part B**

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE NUMBERS
1	2	3	4			
	X			Written operating record contains closure and post-closure cost estimates	265.73(b)(7)	H242
X				All records retained on premises and available for inspection	265.74(a)	H243
X				Quarterly reports submitted to DER	265.75(a)	H244
X				Emissions, discharges, fires, explosions, and groundwater contamination reported as required	265.77(a)	H245
X				Groundwater monitoring wells located at approved sites	265.90(b)	H246
X				Approved groundwater sampling and analysis plan developed and implemented	265.92(a)	H247
X				Adequate protection for groundwater monitoring wells	265.92(d)	H248
X				Groundwater quality assessment and abatement outline on the premises	265.93(a)	H249
	X			Closure plan on the premises and up-to-date	265.112(a)	H250
	X			Post-closure plan on the premises and up-to-date	265.118(a)	H251
	X			Annual closure cost estimate on the premises and up-to-date	265.142(a)	H252
	X			Annual post-closure cost estimate on the premises and up-to-date	265.144(a)	H253

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
TSD FACILITIES - STORAGE (TANKS) - PART A**

Site Name STANLEY FLAGG ID Number PAD001737899 Date 11/16/95

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE NUMBERS
1	2	3	4			
			X	Existing tank system without secondary containment certified by Jan. 17, 1994	264.191(a)	H331
	X			Tanks placed in service after Jan. 17, 1993 certified as required	264.192(a)	H332
			X	Secondary containment provided for tanks as required	264.193(a)	H333
			X	Secondary containment systems designed, installed and operated to meet the requirements	264.193(b-f)	H334
			X	Secondary containment variance approved by DER if not complying with 265.193(a-f)	264.193(g-h)	H335
			X	Tanks managed to prevent leaks, ruptures, corrosion or failing	264.194(a)	H336
X				Appropriate controls or practices used to prevent spills and overflows from tank(s) or secondary containment	264.194(b)	H337
	X			Overfill/spill control equipment inspected per schedule	264.194(d)	H338
X				Tanks labelled to accurately identify contents	264.194(n)	H339
X				Required inspections conducted at least once each operating day	264.195(a)	H340
X				Aboveground portions of tank system inspected	264.195(a)(1)	H341
	X			Data from monitoring & leak detection equipment checked	264.195(a)(2)	H342
X				Construction materials and area immediately surrounding tank system inspected.	264.195(a)(3)	H343
	X			Cathodic protection systems, if present, being inspected as required	264.195(b)	H344
X				Inspections being documented in operating record of facility	264.195(c)	H345
X				Tank or secondary containment system, that has leaked or has a spill, removed immediately from service	264.196	H346

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
TSD FACILITIES - WASTE PILES PART B**

Site Name STANLEY FLAGG ID Number PAD 001737 899 Date 11/16/95

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE NUMBER
1	2	3	4			
	X			Waste piles managed as disposal facility if hazardous waste is stored for longer than one year	265.250	H381
X				Waste piles managed to prevent wind dispersal of materials	265.251	H382
	X			Incoming waste shipments sampled and analyzed before adding to the waste pile if the wastes are amenable to piling and the waste is compatible with the pile.	265.252(a).	H383
	X			Waste analysis differentiates between types of hazardous waste placed in the pile so that mixing does not inadvertently occur. Waste analysis includes a visual comparison of color and texture	265.252(b)	H384
X				Waste piles placed on an impermeable base that is compatible with the waste	265.253(a)(1)(i)	H385
X				Run-on diverted away from waste piles	265.253(a)(1)(ii)	H386
X				Leachate and run-off collected and managed as a hazardous waste	265.253(a)(1)(iii)	H387
X				Waste piles protected from precipitation	265.253(a)(2)	H388
X				No liquids or wastes containing free liquids placed in the pile	265.253(a)(3)	H389
X				Precautions taken for handling ignitable, reactive or incompatible wastes or materials	265.256	H390
X				Incompatible wastes separated or protected from other wastes or materials	265.257(a-b)	H391
	X			Decontamination procedures followed when wastes are to be stored in an area where incompatible wastes or materials were previously piled.	265.257(c)	H392

Hazardous Waste Inspection Report Land Disposal Restriction Supplemental Checklist

1-No Violation Observed					2-Not Applicable	3-Not Determined	4-Non-Compliance
Status				REQUIREMENT	Citation		
1	2	3	4		40 CFR Part 268		
				Generators			
X				Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)		
X				Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)		
X				Dilution not used as a substitute for treatment.	3		
X				Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.	7(a)(5), (a)(6)		
				Storage Facilities			
X				Facility verifies generators classification of waste in accordance with waste analysis plan.	25 Pa Code 265.13(c)		
X				Containers marked to identify contents and accumulation date.	50(a)(2)		
X				Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)		
X				Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)		
X				Facility maintains records of documents produced pursuant to LDR requirements.	7(a)(6)		
				Treatment Facilities, Including PBR and RRR Facilities			
	X			Dilution not used as a substitute for treatment.	3		
	X			Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.	7(b)		
	X			Certification and/or notification sent with shipments of waste.	7(b)(4), (b)(5), (b)(6)		
				Land Disposal Facilities			
	X			Facility tests wastes received to assure compliance with applicable treatment standards.	7(c)(2)		
	X			Facility land disposes of restricted waste only if it meets applicable treatment standard.	40		
	X			Facility retains copies of generator notifications and certifications.	7(c)(1)		

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 11/16/95 Identification Number PAD001737899
Company/Facility/Site Name FLAGG BRASS, W. Pottsgrove Twp.

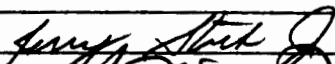
A hazardous waste inspection was performed at this facility in conjunction with the residual waste landfill inspection. All areas of collection and storage were examined. The hazardous waste storage area that has been an ongoing concern is still in violation and further negotiations and possible enforcement options will be addressed at a future date. The only other issue was a hopper that was overflowing - however Jerry Stick informed us that the person responsible for emptying the container has responsibility for doing all the moves throughout the plant and on Saturday comes in and cleans up any spillage and disposes of it properly. Records + inspection logs were audited. No new violations noted during this inspection - only the ongoing ones concerning the waste tank pilot etc.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

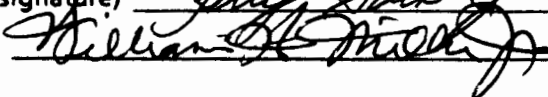
Person interviewed (signature)



Date

11/16/95

Inspector (signature)



Date

11/16/95

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 5/17/95 Time start _____ Time finish _____
Name of Inspector Wm. Miller
Company, installation name FLAGG BRASS
Location 1020 W. HIGH ST. STOWE, PA 19464
County Montgomery Municipality West Pottsgrove Twp
Identification number PAD001737899
Name of responsible official GARY LYMAN
Title ENVIRONMENTAL ENGINEER
Mailing Address _____
Area code and telephone number SAME AS ABOVE
Name of person interviewed JERRY STICK
Title ENVIRONMENTAL TECHNICIAN
Mailing address (if different from above) SAME AS ABOVE
Area code and telephone number (610) 326-9000

1. Current waste handling method:

- | | | | | |
|---|--|-----------------------------------|--|---|
| a. <input checked="" type="checkbox"/> On-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | <input type="checkbox"/> PBR |
| b. <input type="checkbox"/> On-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |
| c. <input checked="" type="checkbox"/> Off-site | <input checked="" type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input checked="" type="checkbox"/> disposal | |
| d. <input checked="" type="checkbox"/> Off-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input checked="" type="checkbox"/> recycle, | <input checked="" type="checkbox"/> reclaim |

2. Amount of hazardous waste produced:

- a. > 1,000 kg/mo.
b. > 12,000 kg/yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
D006 D008	Philip Environmental Services	Hamilton, Ont.
D001 D039	Safety Kleen	West Chester, PA TSD
REPUBLIC	REPUBLIC	
Republic	Republic Env. Systems	Hatfield, PA TSD

4. Source Reduction: ☐ accomplished, ☒ proposed, ☐ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name FLAGG BRASS ID Number PAD CC1737899 Date 5/17/95

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION
1	2	3	4		
X				Hazardous waste determination, performed on all waste streams	262.11
X				Identification number	262.12
X				Hazardous waste shipments offered only to licensed transporters	262.12(d)
X				Authorization received from TSD facility for wastes shipped off-site within PA	262.13
X				PA manifest used for intrastate shipments	262.20(b)
X				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)
X				Manifests filled out properly and completely	262.20(g)
X				Manifests routed properly and within time limits (7 days)	262.23(e)(f)
X				Proper U.S. DOT shipping containers or packages being used	262.30(1)
X				Shipping containers marked and labeled according according to U.S. DOT	262.30(2)
X				Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)
X				Placards offered to transporter	262.33
X				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)
		X		Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)
X				Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)
X				a). All containers of haz. waste in good condition	265.171
X				b). Containers compatible with hazardous waste being stored within	265.172
X				c). Containers of hazardous waste kept closed	265.173(a)
X				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)
X				e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)
X				f). Haz. waste accumulation areas inspected at least weekly	265.174
X				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177
		X		h). Proper containment and collection system(s)	265.178
		X		Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)
X				On the job or classroom personnel training program as per 265.16	262.34(a)(5)

**Hazardous Waste Inspection Report
Generators - Part B**

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION
1	2	3	4		
X				Records retained at designated location for 20 years	262.40(a)
X				Quarterly reports submitted to the Department	262.41(a)
X				Exception reporting procedures followed	262.42
	X			Hazardous waste disposal plan, if required	262.45
X				Spill reporting procedures followed	262.46(a)
X				Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)
X				Special requirements followed for international shipments	262.50, .53, .55, .60
X				Source reduction strategy prepared and available by January 7, 1994	262.80

Hazardous Waste Inspection Report
Land Disposal Restriction Supplemental Checklist

1-No Violation Observed				2-Not Applicable	3-Not Determined	4-Non-Compliance
Status				REQUIREMENT		Citation 40 CFR Part 268
1	2	3	4			
				Generators		
X				Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
X				Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
X				Dilution not used as a substitute for treatment.		3
X				Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.		7(a)(5), (a)(6)
				Storage Facilities		
	↑			Facility verifies generators classification of waste in accordance with waste analysis plan.		25 Pa Code 265.13(c)
				Containers marked to identify contents and accumulation date.		50(a)(2)
				Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
				Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
				Facility maintains records of documents produced pursuant to LDR requirements.		7(a)(6)
				Treatment Facilities, Including PBR and RRR Facilities		
	X			Dilution not used as a substitute for treatment.		3
				Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.		7(b)
				Certification and/or notification sent with shipments of waste.		7(b)(4), (b)(5), (b)(6)
				Land Disposal Facilities		
				Facility tests wastes received to assure compliance with applicable treatment standards.		7(c)(2)
				Facility land disposes of restricted waste only if it meets applicable treatment standard.		40
	✓			Facility retains copies of generator notifications and certifications.		7(c)(1)

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 5/17/95 Identification Number PAD 001 737 899
Company/Facility/Site Name FLAG BRASS STONE, PA WEST POTTSGROVE TWP.

Onsite to perform a hazardous waste generator inspection at this large quantity generator of waste dust and fines that are hazardous for lead and cadmium and flammable solvent waste generated by parts washers throughout the plant. Jerry Stick site environmental technician granted permission to perform the evaluation and accompanied me throughout.

Except for the hazardous waste storage area that Flagg owns is a "tank" and as such I have left those applicable items "not-determined". The facility appears to be in compliance with the hazardous waste regulations at this time. By the time of my July inspection I will be inspecting this area both as a tank and a waste pile until the area is decommissioned.

No violations noted during this inspection

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____

Date _____

Inspector (signature) William A. Miller

Date June 1, 1995

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT - RESIDUAL WASTE LANDFILL

Site I.D. 300852
 Site Name FLAGG BRASS
 Address 1020 W. HIGH
Stowe, PA 19464
 Municipality West Pottsgrove Twp
 Responsible Official GARY LYMAN
 Person Interviewed Jerry Stick
 Inspector Wm. Miller

Telephone # (215) 326-9000
 Operator Name _____
 Address _____
 County _____
 Title Environmental Engineer
 Title Environmental Technician
 Time _____

Due Date 5/17/95 Inspection Date 5/17/95 Inspection Type 01 Facility Type 06 Inspector ID 2132 # Violation 0

Comment: Monthly Evaluation

Permit Expiration Date: _____ Quarterly Groundwater Due Date: _____ Days/Week Operated: _____
 Repermit Date _____ Annual Groundwater Due Date: _____ Max. Daily Volume: _____

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				GENERAL PROVISIONS	CHAPTER CITATION	LINE ITEM
2	3	4				
X				Operation in accordance with approved plans and permit.	288.201(c)(2)	R001
X				Operation within permit boundaries (vertical and horizontal).	288.201(c)(2)	R002*
X				Disposal timing and sequence as per Section 288.112(1)	288.201(c)(2)	R003*
X				No unapproved wastes.	288.201(d)	R004*
X				Facility's certification requirements followed.	288.202	R005
X				Written Department approval of new construction prior to waste disposal.	288.202(c)	R006
X				Inspection of each load in accordance with approved waste analysis plan; analyses maintained for 5 years and available; notification of significant change in waste.	288.203(a)-(c)	R007
				DAILY OPERATIONS		
X				Site perimeter clearly marked and grid coordinate system in use; signs where required.	288.211(a)-(d)	R008
				Proper barriers installed and access controlled when attendant not present.	288.212(a)-(b)	R009
X				Access roads designed, constructed and maintained in accordance with Chapter 105 and 288, and negotiable by collection vehicles.	288.213(a)-(k)	R010
X				Approved means of measuring waste utilized.	288.214(a), (b)	R011
X				Adequate equipment on-site and stand-by equipment available.	288.215(a), (b)	R012
	X			Vehicles directed promptly to unloading area and promptly unloaded, (non captive facilities).	288.216(c)	R013
X				Solid waste spread and compacted into layers not exceeding two feet unless otherwise approved.	288.216(a)	R014
X				Working face size suitable for compaction and daily covering.	288.216(b)	R015
X				No fugitive dust emissions, ambient air quality standards maintained.	288.217(a), (b)	R016
X				No open burning.	288.217(c)	R017*
X				Effective vector control implemented and public nuisances prevented.	288.218(a), (b)	R018
X				Salvaging in accordance with regulations.	288.219(a), (b)	R019
X				Litter controlled/collected and barriers/fences in place.	288.220(a)-(c)	R020

INSPECTION REPORT - RESIDUAL WASTE LANDFILL (Cont'd)

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				COVER/SLOPES/REVEGETATION	CHAPTER CITATION	LINE ITEM
1	2	3	4			
	↑			Top soil removed and stored in accordance with regulations.	288.231	R021
	↑			Uniform daily cover applied as required.	288.232(a)	R022
	↑			Daily/intermediate cover meets performance and design requirements.	288.232(c), (d) & 288.233(c), (d)	R023
	↑			Minimum 5 day supply of daily and intermediate cover maintained on-site.	288.232(e) & 288.233(e)	R024
	↑			Intermediate cover applied within time limits.	288.233(a)	R025
	↑			Intermediate cover temporarily revegetated as required.	288.233(f)	R026
	X			Intermediate slopes covered, revegetated, and do not exceed 50%.	288.233(g)	R027
	↓			Two foot compacted clay cap placed and graded over entire surface of final lift unless otherwise approved.	288.234(a)(1)	R028
	↓			Drainage layer installed over cap as approved.	288.234(a)(2)	R029
	↓			Uniform and compacted layer of soil placed over drainage layer.	288.234(a)(3)	R030
X				Final cover meets performance and design requirement; applied within time limits.	288.234(c)-(e)	R031*
X				Final slopes stable and erosion controlled.	288.234(f), (g)	R032
X				Final slopes graded or terraced to 33% as approved.	288.234(g)(3)	R033
X				Extraction and removal of cover material meets regulations.	288.235	R034
X				Minimum revegetation and successful revegetation requirements adhered to.	288.236 & 288.237	R035*
				WATER QUALITY PROTECTION		
X				Surface and groundwater discharges prevented unless otherwise authorized by the Department.	288.241(a)-(c)	R036
X				Surface and groundwater treatment facilities properly operated and maintained.	288.241(b)	R037
X				Surface water percolation minimized/prevented.	288.242(b)(1) & 288.234(f)(4)	R038
X				Soil erosion and sedimentation controls as per approved plans; implemented(*) gullies over nine inches repaired.	288.242(a)(c)	R039*
X				Sedimentation ponds and discharge structures constructed, operated/maintained in accordance with Chapters 288, 102, and 105.	288.243(a)-(g) & 288.244	R040*
	X			Water supply replacement program in effect if required.	288.245(a)-(c)	R041
				WATER QUALITY MONITORING		
X				Approved monitoring system installed(*) and maintained.	288.251(a), (b)	R042*
X				Quarterly and annual monitoring requirements adhered to and results submitted to Department within time constraints.	288.254 & 288.255	R043
X				Groundwater assessment plan submitted and implement as required.	288.256(a)-(g)	R044
X				Groundwater abatement plan submitted and implemented as required.	288.257(a)-(h)	R045

INSPECTION REPORT - RESIDUAL WASTE LANDFILL (Cont'd)

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				LINER SYSTEM	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Liner system constructed(*), operated/maintained when required.	Class I 288.431 Class II 288.531 Class III 288.624	R046*
X				Edge of liner requirements adhered to (i.e., no waste within 25 feet if adjacent liner or 15 feet if no adjacent liner, 4 feet high berm, and marked).	288.432(d)-(g) or 288.532(d)-(g)	R047
X				Leachate detection zone monitored weekly.	288.435(c)	R048
X				Protective cover protects primary liner and leachate collection system and allows free flow of leachate into the collection system.	288.437(a) or 288.536(a)	R049
X				Protective cover meets minimum requirements and at least 18 inches thick.	288.437(b) or 288.436(b)	R050
X				Leachate collection system within protective cover meets minimum requirements.	288.438 or 288.537	R051
				Barrier designed, constructed and maintained as required to prevent lateral migration of leachate off-site in surface mined areas.	288.439 or 288.538	R052
X				8 feet of select waste placed over protective cover.	288.440	R053
				LEACHATE TREATMENT		
X				Leachate collected and handled through Department approved method(s).	288.452 or 288.552	R054
	X			Leachate transportation requirements adhered to.	288.453(a)-(c) or 288.553(a)-(c)	R055
X				Cessation of site operation if alternate leachate handling not available.	288.453(d) or 288.553(d)	R056
X				Leachate recirculation in accordance with regulations.	288.454 or 288.554	R057
X				Leachate collection and storage systems on-site have capacity of 30 days or 250,000 gallons, whichever is greater. No more than 25 percent of total storage capacity used for flow equalization on a regular basis.	288.455 or 288.555	R058
X				Leachate flow rate measured daily; analyzed quarterly.	288.456 or 288.556	R059
				Department notified when remedial action(s) required.	288.457 or 288.557 or 288.625	R060*
				RECORDKEEPING AND REPORTING		
X				Operational records maintained, available and submitted as required.	288.258 and 288.281-288.283	R061
				MINERALS AND GAS		
	X			25 foot isolation maintained from coal formations and mine openings sealed in approved manner.	288.261(a), (b)	R062
	X			Subsidence plan implemented as approved.	288.261(c)	R063
	X			Gas venting and monitoring in accordance with approved plans.	288.262(a)-(d)	R064
X				Combustible gas levels not exceeded.	288.262(e)	R065
X				Forced gas venting if required.	288.262(f)	R066
X				Gas recovery conducted as per approved plan and §288.161, including annual analysis.	288.263(a), (b)	R067

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 5/17/95 Identification Number 300852
Company/Facility/Site Name FLAGG BRASS STONE, PA West Pittsgrove Twp

Onsite to conduct a monthly evaluation of this Captive Residual Waste Landfill. The landfill has received wastes only one day thus far in the month of May, according to the operational records. As a result the conditions at the landfill have not changed markedly. Jerry Stick, Flagg's environmental technician granted me permission to inspect the landfill and accompanied me throughout the evaluation. During the inspection I noted one section of the silt fence that lines the eastern edge of the road shifted and needs to be resecured. Nothing else notable to report.

No violations noted during this inspection.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Jerry Stick Jr. Date 5/17/95
Inspector (signature) William H. Mullin Jr. Date 5/17/95

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 6/29/94 Time start _____ Time finish _____
Name of Inspector Carol Sharp
Company, installation name Stanley Flagg (Flagg Brass)
Location 1020 W. High Street
County Montgomery Municipality W. Pottsgrove
Identification number PAD001737899
Name of responsible official Mike Cookman
Title PRESIDENT
Mailing Address _____
Area code and telephone number (610) 326-9000
Name of person interviewed Conrad Hiembach
Title Chief Plant Engineer
Mailing address (if different from above) _____
Area code and telephone number _____

1. Current waste handling method:

- | | | | | |
|--------------------------------------|-------------------------------------|-----------------------------------|-----------------------------------|----------------------------------|
| a. <input type="checkbox"/> On-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | <input type="checkbox"/> PBR |
| b. <input type="checkbox"/> On-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |
| c. <input type="checkbox"/> Off-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | |
| d. <input type="checkbox"/> Off-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |

2. Amount of hazardous waste produced:

- a. _____ kg./mo.
b. _____ kg./yr.

Follow-up inspection
to PBR evaluations
of 5/3/94

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type

4. Source Reduction: ☐ accomplished, ☐ proposed, ☐ not proposed

Inspection Report Comments

Date of Inspection 6-29-94 Identification Number PA0001237899Company/Facility/Site Name Stanley E. Lagg

This inspection was conducted as a follow-up to my 2-7-94, 4-13-94, and 5-3-94 inspections in which a total of 6 violations were observed. Several items which were marked "Not Determined" were reevaluated during this inspection and a few important suggestions were also made in order to assist the facility in avoiding noncompliance. I was joined during the inspection by Conrad Heimbach.

The violations cited in the previous inspections mentioned above included:

1. Run-on into the 'moondust' hazardous waste containment area; Section 265.178.
2. through 4. Unmanifested shipments of hazardous waste to an unpermitted TSD facility; Sections 262.13(a), 262.20, 262.33.
5. Lack of a 24 hour surveillance for the Permit by Rule facility; Section 264.14(b)(1).
6. Lack of proper signs on the treatment plant processes; Section 264.14(c).

Steps that have been taken to resolve these violations:

1. It could not be determined whether run-on into the hazardous waste containment area had been prevented. No run-on was observed at the time of inspection. Mr. Heimbach indicated that Gary Lyman was in the process of preparing a closure plan for the moondust shed and the sphincter cone, however Mr. Lyman was not available to discuss the status of the closure plan.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) [Signature] Date 3/12/94Inspector (signature) Carol Sharp Date 8/4/94Page 2 of 5

Inspection Report Comments

Date of Inspection 6/29/94 Identification Number PA0001737899
Company/Facility/Site Name Stanley Flagg

2. through 4. I was advised that Flagg does not ship any of their hazardous wastes to St. Joe's Zinc America but that they do send their ash to St. Joe's. Whether a hazardous waste determination has been performed on this ash was not determined at the time of this inspection and will be evaluated at a later date.

5. Twenty-four hour surveillance of the active portion of the treatment facility is being achieved through the use of cameras at each access gate to the facility. A guard is responsible for viewing the monitoring screens. Compliance with Section 264.14(b)(1) has apparently been maintained.

6. Signs were observed at each active portion of the treatment plant. Compliance with Section 264.14(c) has been acquired.

One additional violation was observed:

Discussed during the 5-3-94 inspection was Flagg's unpermitted accumulation of hazardous waste in a pile located in the HW storage shed. The storage of hazardous waste in a pile without a permit is a violation of Section 262.34 (a)(2). While this issue was discussed with Mr. Heimbach during the 5-3-94 site inspection, it was inadvertently left out of my inspection report comments. Nonetheless, this is a violation, therefore Flagg should cease accumulating waste in the storage shed pile and begin storing it in a container and/or tank within 15 days of receipt of this inspection report.

Other observations and recommendations:

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

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Person Interviewed (signature) [Signature]

Date 7/12/94

Inspector (signature) Carol Sharp

Date 8/4/94

Page 3 of 5

Inspection Report Comments

Date of Inspection 6/29/94 Identification Number PADCO1737899
Company/Facility/Site Name Stanley Flagg

It was recommended during the 5-3-94 inspection, and in a June 13, 1994 letter from Bob France, Waste Management Supervisor, that a chemical analysis of the wastewater treatment plant's filter cake be provided to the Department. To date, no results have been received by the Department. The results of this analysis should be forwarded as soon as possible.

A review of hazardous waste manifests revealed that volume discrepancies are still occurring in Flagg's shipments of waste. Manifest number PAE0810051 indicates that 6000 gallons of hazardous waste oil were shipped to Booth Oil located in New York. However, Booth Oil indicated on the manifest that only 1944 gallons were received, a discrepancy of 4056 gallons. An explanation for this discrepancy is requested. Please submit in writing to the Department within 30 days, an explanation for the above mentioned hazardous waste manifest discrepancy. Include an accounting for the waste that was indicated as being shipped but not received by the disposal facility.

Previously "Not Determined" items:

a. Record of inspections of equipment. The treatment plant operator had been keeping a Waste Water Treatment Plant Daily Log (copy attached) which indicates what equipment is inspected and what type of maintenance had been performed. I was informed during the inspection that the treatment plant operator had recently retired, therefore, the new treatment plant operator should continue keeping these Daily Logs. During the inspection I observed that a large amount of liquid had become puddled on the floor by one of the treatment plant tanks. The cause of this leak and the steps taken to correct and clean it up should be included in the Daily Log for this date.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature) [Signature]

Date 2/12/94

Inspector (signature) [Signature]

Date 8/4/94

Page 4 of 5

Inspection Report Comments

Date of Inspection 6/29/94 Identification Number PAD001737879
Company/Facility/Site Name Stanley Flagg

b. Use of an up-to-date PPC Plan. Stanley Flagg's PPC plan appeared to be current in it's list of emergency coordinators and phone numbers although the plan was last updated in 1992. The PPC plan did not specifically address the method of managing spills in the treatment plant, but instead included a general management plan. With the recent changes in the facility's processes and staff, it is recommended that this PPC plan be reviewed to ensure that it is up-to-date and accurate.

In conclusion, two violations have been corrected, compliance with three violations could not be determined, one additional violation was observed which should be addressed and corrected, and after being provided with the necessary information I was able to determine that the facility was in compliance relative to a previously noted violation involving twenty-four hour surveillance.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

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Person Interviewed (signature) [Signature] Date 8/4/94
Inspector (signature) Carol Sharp Date 8-4-94
Page 5 of 5



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

214a Rep EPA/750

Date of Inspection 4/13 & 5/3/94 Time start _____ Time finish _____
Name of Inspector Carol Sharp
Company, installation name Stanley G. Flagg (Flagg Brass)
Location 1020 W. High Street, Stowe, PA 19464
County Montgomery Municipality W. Pottsgrove
Identification number PAD001737899
Name of responsible official Thomas Jacobs
Title President
Mailing Address _____
Area code and telephone number (610) 326-9000
Name of person interviewed Jerry Stick ; Conrad Hiembach
Title Env. Technician ; Chief Plant Engineer
Mailing address (if different from above) _____
Area code and telephone number _____

1. Current waste handling method:

- a. ☒ On-site ☐ treatment, ☐ storage, ☐ disposal ☒ PBR
b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
c. ☒ Off-site ☒ treatment, ☐ storage, ☒ disposal
d. ☒ Off-site ☐ use, ☐ reuse, ☒ recycle, ☒ reclaim

2. Amount of hazardous waste produced:

- a. > 1,000 kg./mo.
b. _____ kg./yr.

Part B evaluation
conducted 2-7-94.
This inspection - PBR
only.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
D006		
D008		
D001, D039		
D018, F001		
PA01		

4. Source Reduction: ☐ accomplished, ☐ proposed, ☐ not proposed

PERMIT BY RULE REQUIREMENTS

Title 25

Chapter 265

Subchapter 433

1 - no violation observed

2 - not applicable

3 - not determined

4 - noncompliance

Chapter Citation 264	Requirements	Compliance Status			
		1	2	3	4
.14(b)(1)	Active portion has 24 hour surveillance.				X
.14(b)(2)	Artificial barrier surrounds active portion. <i>Fence surrounds entire plant</i>	X			
.14(c)	Proper signs are posted.				X
.15(b)(1)	Inspection schedule is on-site.			X	
.15(c)	Inspections are conducted as per inspection plan.			X	
.15(d)	Deterioration and/or malfunctions of equipment corrected as revealed by inspections.			X	
.15(d)	Immediate remedial action taken when a hazard is imminent or already present.		X		
.15(e)	Inspection log is maintained and utilized properly.			X	
.32(1)	Facility is equipped with internal alarm system capable of providing immediate emergency instruction to personnel.	X			
.32(2)	Facility is capable of summoning outside emergency assistance.	X			
.32(3)	Facility is equipped with spill and decontamination control equipment.	X			
.33	Facility communications and/or alarm systems and spill and decontamination control equipment is periodically tested and maintained.			X	
.35	Adequate aisle space is maintained to allow unrestricted access for personnel and emergency equipment.	X			
.53(1)	A copy of the PPC plan and all revisions to the plan is available at the facility.			X	
.52(d)	The contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator.			X	
.55	One employee is designated as the primary emergency coordinator and is either on-site or on call at all times.	X			
.73(a)	Operating records are maintained at the facility.			X	
.73(b)(1)	Description and quantities of wastes treated and discharged under PRR.			X	
.73(b)(3)	Results of waste analyses and trial tests performed under 265.13.		X		
.73(b)(4)	Summary reports and details of any incidents requiring implementation of the contingency plan.			X	
.11[-a]	Facility has an identification number [PAD#]	X			

PERMIT BY RULE REQUIREMENTS
(Continued)

1 - no violation observed
2 - not applicable
3 - not determined
4 - noncompliance

Chapter Citation 264	Requirements	Compliance Status			
		1	2	3	4
.73(b)(5)	Results of all on-site inspections, including those outlined in below.			X	
56(j); 73(b)(4) 77(a)	Emissions, discharges, fires, explosions and groundwater contamination reported to the Department as required.			X	
.75(b)(e)	Quarterly reports submitted			X	
.177 .17(a)(b)	Special precautions are taken to prevent accidental ignition or reaction of hazardous wastes.		X		
CHAPTER 265 401(b)	Hazardous waste or treatment reagents are not placed in a treatment process or equipment if they could cause it to rupture, leak, corrode or otherwise fail.	X			
401(c)	Continuously fed equipment is fitted with a means of stopping the inflow.	X			
402	When facility treats a waste which is substantially different from previously treated wastes, the owner or operator shall: Conduct waste analyses and trial treatment tests or substitute written documentation to show that the proposed process will not cause ignition, reaction, or damage to equipment.		X		
403(1)	The following minimum inspections are performed Discharge control and safety equipment at least once each operating day.			X	
403(2)	Data from process monitoring equipment at least once each operating day to ensure proper operation.	X			
403(3)	Construction materials of the treatment process and equipment at least once weekly to detect corrosion or leaks.			X	
403(4)	Construction materials of discharge containment structures and immediate surrounding area at least weekly to detect erosion or leaking.			X	
433(2)	Facility has an NPDES permit or discharges to a POTW	X			

(PRR)0271.3

Inspection Report Comments

Date of Inspection 4/13/94 & 5/3/94 Identification Number PAD001737899
Company/Facility/Site Name Stanley Flagg (Flagg BRASS)

In order to evaluate Stanley Flagg's compliance with the Department's Hazardous waste Permit by Rule requirements, two inspections were conducted. On April 13, 1994 a joint inspection with the Bureau of Water Quality was performed at the facility's waste water treatment plant, and on May 3, 1994 another inspection was conducted of the facility's treatment plant and sphincter cone unit. The results of both of these inspections are concluded below.

On August 22, 1984 Stanley Flagg was granted approval for operation of a hazardous waste permit by rule facility for the treatment of their aqueous hazardous waste under N.P.D.E.S. permit # PA0050903. This approval included the use of the sphincter cone and industrial wastewater treatment plant.

Sphincter Cone: Wastewater from the brass operation passed through the sphincter cone in order to collect and concentrate solids, while the remaining water was collected in a pit which lead to a small cement impoundment, then in turn lead to the treatment plant. The wastewater that was passed through the cone was generated from a wet air filtering process which was replaced by a dry mill system sometime during the summer of 1988. At the time of the inspection, the sphincter cone unit was observed to still be in place with it's associated water collection pit and concrete impoundment. The collection pit was observed to still contain some liquids and solids. This unit and any associated equipment which may have come in contact with hazardous waste should be properly decontaminated and/or closed as per Section 265.404 of the Department's Hazardous Waste Management

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Person Interviewed (signature) Conrad L. Heinbach Date 6/21/94
Inspector (signature) Carol Sharp Date 5-17-94
Page 4 of 7

Inspection Report Comments

Date of Inspection 4/13/94 & 5/3/94 Identification Number PAD001737899
Company/Facility/Site Name Stanley Flagg (Flagg BRASS)

Regulations. All hazardous waste and hazardous waste residues should be removed from the treatment process equipment, discharge control equipment, and discharge confinement structures.

Wastewater treatment plant: The wastewater treatment plant was put into operation in 1983/1984 as part of a Bureau of Water Quality Consent Order of Agreement. As best as can be determined, the hazardous wastes that historically entered into the treatment plant consisted of the following:

1. Sphincter cone effluent,
2. Iron galvanizing waste waters (containing Cadmium and Lead),
3. galvanizing lagoon waters which were pumped out of the lagoons and into the treatment plant in 1984.

Additional hazardous wastes that are still being treated at the plant include the following:

4. Contaminated water from the groundwater recovery well used to collect the plume created from the use of unlined galvanizing lagoons,
5. Leachate from the passage of stormwater through the hazardous waste storage pile,
6. Acid batches from the galvanizing process (although the galvanizing process was shut down in 1993, acids were observed during the April 13 inspection to still be going into the wastewater treatment plant's equalization basin),
7. Leachate from the residual waste landfill. The landfill apparently at one time received several loads of

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This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve as formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature) Carol Sharp Date 5-17-94
Inspector (signature) Carol Sharp Date 5-17-94

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Company/Facility/Site Name Stanley Flagg (Flagg Brass)

hazardous waste from their foundry, and presently receives sludges from the wastewater treatment plant.

Stanley Flagg should perform a hazardous waste determination on the sludges that are collected in the treatment plant and disposed of in the onsite landfill. A form U (Request to Process or Dispose of Residual Waste) may be used for reporting the results of the analysis and will serve the dual purpose of meeting the requirements of Section 287.115 of the Residual Waste Management Regulations (related to filing of permitted residual waste facilities). A form U has been provided along with this inspection report. Any questions you may have on completing this form should be directed to Larry Lunsik, Waste Management Facility Manager at 832-6213.

Several items on this inspection report are marked as 'Not Determined'. Compliance with these requirements could not be determined due to the fact the treatment plant operator was off during the day of the inspection. The items that could not be determined include the following:

a. A record of inspections conducted for the purpose of identifying and correction malfunction and deterioration, operator errors and discharges. Inspections of monitoring equipment, safety and emergency equipment, security devices, and areas subject to spills. These inspections are required to be recorded in a log which includes the date of inspection, observations made, and the date and nature of any repairs or remediation. While the security guard in the guard shack does keep a record of the

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process equipment alarms that are sounded, as well as who was then paged to handle the problem, the record does not include the date and nature of any repairs.

b. An updated PPC plan with all revisions,

c. An operating record with a description and quantity of each hazardous waste treated and method of treatment. A quarterly report may be used to record this information.

The above 'Not Determined' items will be evaluated in a follow up inspection.

In conclusion, two violations of the Permit by Rule requirements were observed. Section 264.14(b)(1) requires the active portion of the facility to have 24 hour surveillance. During the inspection it was observed that the treatment plant was unattended by an operator and no other method of monitoring or controlling unauthorized access to the facility was in place. Section 264.14(c) requires the active portions of the facility to be posted with signs with the legend "Danger-Unauthorized Personnel Keep Out" or the equivalent. While a sign was observed at the main entranceway to the facility, the rear accessway and the equalization basin do not contain warning signs. These two violations should be addressed and corrected, and a closure plan for the sphincter unit should be developed.

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